

1 Robert A. Julian (SBN 88469)
2 Cecily A. Dumas (SBN 111449)
BAKER & HOSTETLER LLP
3 Transamerica Pyramid Center
600 Montgomery Street, Suite 3100
San Francisco, CA 94111-2806
4 Telephone: 415.659.2600
Facsimile: 415.659.2601
5 Email: rjulian@bakerlaw.com
Email: cdumas@bakerlaw.com

6 Eric E. Sagerman (SBN 155496)
7 David J. Richardson (SBN 168592)
Lauren T. Attard (SBN 320898)
BAKER & HOSTETLER LLP
11601 Wilshire Blvd., Suite 1400
9 Los Angeles, CA 90025-0509
Telephone: 310.820.8800
10 Facsimile: 310.820.8859
Email: esagerman@bakerlaw.com
Email: drichardson@bakerlaw.com
Email: lattard@bakerlaw.com

12 *Counsel to the Official Committee of Tort Claimants*

14 **UNITED STATES BANKRUPTCY COURT**
15 **NORTHERN DISTRICT OF CALIFORNIA**
16 **SAN FRANCISCO DIVISION**

17 **In re:**

18 **PG&E CORPORATION,**

19 **- and -**

20 **PACIFIC GAS AND ELECTRIC
COMPANY,**

21 **Debtors.**

22

23 Affects PG&E Corporation

24 Affects Pacific Gas and Electric Company

25 Affects both Debtors

26 *All papers shall be filed in the Lead Case,
No. 19-30088 (DM).

Bankruptcy Case
No. 19-30088 (DM)

Chapter 11
(Lead Case)
(Jointly Administered)

**REQUEST FOR ENTRY OF ORDER
BY DEFAULT ON APPLICATION OF
THE OFFICIAL COMMITTEE OF
TORT CLAIMANTS FOR FINAL
APPROVAL OF EXPENSE
REIMBURSEMENT FOR ALL
EXPENSES INCURRED FOR THE
PERIOD FROM FEBRUARY 15, 2019
THROUGH JULY 1, 2020 PURSUANT
TO 11 U.S.C. § 503(b)(3)(F)**

[Re: Dkt. No. 8944]

REQUEST FOR ENTRY OF ORDER BY DEFAULT

2 The Official Committee of Tort Claimants (the “**TCC**”), representing the largest group of
3 stakeholders in the jointly administered bankruptcy cases (the “**Bankruptcy Cases**”) of PG&E
4 Corporation and Pacific Gas and Electric Company, hereby requests that the Court enter an order
5 by default on the Application of the Official Committee of Tort Claimants for Final Approval of
6 Expense Reimbursement for all Expenses Incurred for the Period From February 15, 2019 Through
7 July 1, 2020 Pursuant to 11 U.S.C. § 503(b)(3)(F) (the “**Application**”) [Dkt. No. 8944] filed by the
8 TCC on August 31, 2020, pursuant to Rule 9014-1(b)(4) of the Bankruptcy Local Rules for the
9 United States District Court for the Northern District of California and the Second Amended Order
10 Implementing Certain Notice and Case Management Procedures entered on May 14, 2019 [Dkt.
11 No. 1996].

RELIEF REQUESTED IN THE APPLICATION

13 The Application seeks entry of an order for final allowance of reimbursement payments
14 made to TCC members for actual and necessary expenses incurred in connection with the Members'
15 service on the TCC prior to the effective date of the Debtors' and Shareholder Proponents' Joint
16 Chapter 11 Plan of Reorganization Dated June 19, 2020 [Dkt. No. 8048]. A proposed order was
17 submitted as Exhibit A to the Application and is virtually identical to the proposed order (the
18 "**Proposed Order**") submitted herewith, except that the docket number of the Application has been
19 added to the Proposed Order, decretal paragraph number two of the original proposed order, which
20 directed the Reorganized Debtors to make prompt payment to the TCC, has been removed, and a
21 footnote has been added stating that capitalized terms that are undefined in the Proposed Order
22 have the meanings ascribed to them in the Application.

NOTICE AND SERVICE

24 The Application was served as described in the Certificate of Service of Heidi Hammon-
25 Turano, which was filed on September 3, 2020 [Dkt. No. 8994]. The deadline to file objections or
26 responses to the Application has passed. No objections or responses have been filed with the Court
27 or received by counsel for the TCC.

DECLARATION OF NO RESPONSE RECEIVED

The undersigned hereby declares, pursuant to 28 U.S.C. § 1746, under penalty of perjury, that:

1. I am a partner of the firm of Baker & Hostetler LLP and Counsel for the TCC.
2. I certify that I have reviewed the Court's docket in these Bankruptcy Cases and have not received any response or opposition to the Application.
3. This declaration was executed in San Francisco, California.

WHEREFORE, the TCC hereby respectfully requests entry of the Proposed Order substantially in the form attached hereto, granting the Application as set forth therein.

10 || Dated: February 3, 2021

BAKER & HOSTETLER LLP

By: /s/ Cecily A. Dumas
Cecily A. Dumas

*Counsel to the Official Committee of Tort
Claimants*